

February 7, 2022

Forrest Buffington
Attorney at Law
Barber & Borg, LLC
Navajo Injury Law Center
6240 Riverside Plaza Lane NW, Suite 250
Albuquerque, NM 87120

RE: Minnie Taylor as Personal Representative to the Estate of Louie Taylor, and
Harold Cuthair vs United States of America

Dear Mr. Buffington,

Please accept this Addendum to my previously submitted report regarding the attention provided to Mr. Louie Dean Taylor on February 29, 2020 and March 1, 2020 while in custody at the Shiprock Adult Detention Center. Since the submission of that report, I have been provided and have reviewed the following document:

1. New Mexico EMS Billing Report, Navajo Nation EMS — Shiprock, Document Numbers 003667-003671

Summary

According to the document provided, on March 1, 2020 at 12:09 a.m., Navajo Nation EMS was dispatched to the Shiprock Adult Detention Center in response to an unresponsive person, approximately 30 years old, without a pulse and without any signs of respiration. According to the report filed by Leonard Davis, Jr., EMT-Basic, he and his colleague, Shane Nakewa, EMT-Basic, arrived at the Shiprock Adult Detention Center at 12:12 a.m., where they encountered an officer performing chest compressions on Mr. Taylor. The EMS report described Mr. Taylor's holding cell as "like a sauna." The report described Mr. Taylor as entirely unresponsive with skin that was warm to touch and moist from "water on the floor of [the] cell." Mr. Taylor had no pulse and his pupils were dilated and non-responsive to light.

An Automated External Defibrillation (AED) was attached to Mr. Taylor and displayed a rhythm of Pulseless Electrical Activity (PEA). Mr. Taylor subsequently underwent placement of an oropharyngeal airway. He received chest compressions and mechanical ventilations in the ambulance until his arrival at Northern Navajo Medical Center.

Discussion

Prior to his death, Mr. Taylor was displaying symptoms of moderate to severe methamphetamine toxicity as manifested by his significant psychomotor agitation, hallucinations, and paranoia. Hyperthermia (elevated body temperature) is a well-known and treatable complication of methamphetamine toxicity, which can itself lead to

respiratory failure, cardiac failure, seizures, kidney injury, and severe electrolyte imbalance, which can ultimately result in PEA and death. Treatment of hyperthermia includes sedation to reduce heat generated from muscle contractions, resuscitation with intravenous fluids, and aggressive cooling using fans, ice packs, or other cooling devices.

It is my opinion to a reasonable degree of medical certainty that Mr. Taylor's hours-long period of psychomotor agitation (described as kicking, punching, yelling, and pacing) while being contained in a cell described by a medical professional as "like a sauna," placed Mr. Taylor at very high risk for severe methamphetamine-associated hyperthermia, which is life-threatening, but treatable with timely and quality medical care.

Respectfully Submitted,
Virginia Harvey, MD

A handwritten signature in black ink that reads "Virginia Harvey, MD". The signature is fluid and cursive, with "Virginia" on top and "Harvey, MD" on the bottom right.